STATE OF CALIFORNIA — GEORGE DEUKMEJIAN, *Governor*

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD—
LOS ANGELES REGION
101 Centre Plaza Drive
Monterey Park, California 91754-2156
(213) 266-7500

October 22, 1990

Ms. Nicole Jafari
STOODY COMPANY
P.O. Box 1901
City of Industry, CA 91749-1901

WORK PLAN DIRECTIVE (FILE NO. AB105.263)

Board staff is in receipt of your soil assessment and clarifier investigation report. Review of soil analyses, along with quarterly ground water monitoring results indicate waste disposal practices at your site have impacted local ground water. Further investigation and remediation of subsurface conditions is necessary:

1) Analyses of soil samples obtained adjacent to the sump located in the barrel storage area detected high concentrations of volatile organic compounds (VOCs) and total petroleum hydrocarbons (TPH). Analysis of Board split samples obtained from SB-1 detected the following compounds:

	1'	10'
t-1,2-DCE	393 µg/kg	ND
c-1,2-DCE	3500 "	126 µg/kg
TCE	147 "	ND
1,1,2-TCA	ND	37 µg/kg
PCE	100 µg/kg	907 "
Toluene	73 "	ND
Chlorobenzene	17 "	ND
MIK	100 "	ND
TPH	4875 mg/kg	----

2) Sludge and soil samples obtained adjacent to the clarifier also showed high levels of VOCs and TPH. It must be assumed that the clarifier inlet/outlet piping is not sound, and unpermitted discharge continues.

You are therefore directed to submit to this Board a work plan to further define the extent of soil and groundwater contamination at your facility. The work plan must meet the enclosed requirements (Attachments 1 and 2--INITIAL and SUPPLEMENTARY SUBSURFACE ENGINEERING/GEOLOGIC SOIL INVESTIGATION), with the following modifications:

A. CLARIFIER AND SUMP INVESTIGATION/REMEDIATION

1) The clarifier must be emptied of all waste materials, steam cleaned, and inspected to determine where damaged. It must be either repaired, retro-fitted, or removed.

2) All underground pipework servicing the clarifier must be inspected to determine integrity. This may be conducted during excavation of contaminated soils.

3) All contaminated soils around the clarifier must be removed for disposal or remediation. Confirmatory sampling (sidewall and bottom) is required. Residual maximum concentrations of contaminants must meet the following criteria:

a) VOC levels must be less than ten times (10x's) State action levels or maximum contaminant levels (MCLs).
b) TPH levels must not exceed 10 ppm.

4) Obtain at least two soil samples for metals analyses. Analyze samples for soluble and total metal content for nickel, copper, and chromium VI.

5) Remediation/confirmation measures will be required adjacent to the sump located in the barrel storage area. Criteria for VOCs and TPH as stated in above section A.3. will apply.

B. ADDITIONAL GROUNDWATER INVESTIGATION REQUIREMENTS

1) One shallow groundwater monitoring well will be required. The well must be located immediately down-gradient of the clarifier.

2) Four inch diameter stainless steel well screens will be required. Use of PVC for casing material is acceptable.

3) Prior to purging of the new well, a ground water sample must be obtained for TPH analysis (EPA Method 418.1).

4) Continuation of the Stoody ground water monitoring program is required. All previous monitoring program requirements as discussed in August 21, 1989 Board correspondence still apply, with the following changes:

a) Analyze groundwater for VOCs using EPA Methods 502.1/ 503.1, 502.2, or 524.2.

b) If TPH is detected in the initial sampling of the well located adjacent to the clarifier, subsequent samplings of the well will require analysis for TPH.
c) The first monitoring/progress report will be required on **January 2, 1991**, with each successive reports due on the first of the month for each following quarter. An annual summary report will be due **October 1, 1991**.

Four copies of the work plan are due to Board staff by **December 3, 1990**. Please remember that the work plan should not be implemented until it has been approved by Board staff.

If you have any further questions, please contact Dainis Kleinbergs at (213)266-7530 and address all correspondence to his attention.

ROY R. SAKAIDA
Senior Water Resource
Control Engineer

RRS:dk

Enclosures

cc: Joe Viray, U.S. Environmental Protection Agency, Region 9
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